

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

Terrance Johnson, Brent Yahraus, and Jacy
Purkiss, individually and as the
representatives of a class of similarly
situated persons, and on behalf of the
Carpenters of Western Washington
Individual Account Pension Plan and the
Carpenters Retirement Plan of Western
Washington,

Plaintiffs,

v.

Carpenters of Western Washington Board of
Trustees, Callan LLC, Gerald Auvil, Noe
Castillo, Ken Ervin, Jeff Foushee, Kurt
Hildebrand, Steve Hoffmann, Martin
Holberg, Dan Hutchins, Ryan Hyke,
Andrew Ledbetter, Ron Montoya, Jim
Osborne, Tim O'Neill, Doug Peterson, Rick
Poitras, Danny Robins, Evelyn Shapiro, Bob
Susee, Jeff Thorson, Doug Tweedy, and
Wilf Wainhouse,

Defendants.

Case Number: 2:22-cv-01079-JHC

STIPULATED MOTION AND ORDER
REGARDING CASE DEADLINES

Plaintiffs Terrance Johnson, Brent Yahraus, and Jacy Purkiss (“Plaintiffs”) and Defendants Carpenters of Western Washington Board of Trustees, Gerald Auvil, Noe Castillo, Ken Ervin, Jeff Foushee, Kurt Hildebrand, Steve Hoffmann, Martin Holberg, Dan Hutchins, Ryan Hyke, Andrew Ledbetter, Ron Montoya, Jimmy Osborne, Tim O’Neill, Doug Peterson, Rick Poitras, Danny Robins, Evelyn Shapiro-O’Connor, Bob Susee, Jeff Thorson, Doug Tweedy, Wilf Wainhouse, and Callan LLC (collectively, the “Parties”), hereby stipulate as follows:

1. On December 6, 2024, the Parties submitted a joint status report proposing various case-related deadlines. Dkt. 143. The Parties specifically agreed on the deadlines for responsive pleading(s), Rule 26(a)(1) initial disclosures, and amending the complaint and/or adding parties. *Id.*

2. On December 19, 2024, the Court directed the Parties to propose deadlines corresponding to the completion of discovery on class certification and Plaintiffs’ motion for class certification, Dkt. 144, which the Parties proposed in a joint status report on January 8, 2025. Dkt. 145.

3. On January 10, 2025, the Court entered its Scheduling Order, setting deadlines for the completion of discovery on class certification and Plaintiffs’ motion for class certification. Dkt. 146.

4. The Parties seek the Court’s guidance on preliminary deadlines that will necessarily precede and inform class certification discovery and briefing. Given the Parties’ agreement on the preliminary deadlines identified below, and subject to the Court’s approval, the Parties respectfully propose the Court enter an order establishing the following case deadlines in addition to those set forth in the Court’s January 10, 2025 Scheduling Order:

Event	Deadline
Deadline for Defendants to file responsive pleading(s)	February 14, 2025
Exchange of Rule 26(a)(1) Initial Disclosures	February 28, 2025
Deadline to amend complaint and/or add parties	May 16, 2025

IT IS SO STIPULATED.

Dated: January 21, 2025

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23 *Jimmy Osborne, Doug Peterson, Rick*
24 *Poitras, Danny Robins, Evelyn Shapiro-*
25 *O'Connor, Bob Susee, Jeff Thorson,*
26 *Doug Tweedy, and Wilf Wainhouse*

ORDER

It is so ordered.

DATED this 22nd day of January, 2025.

A handwritten signature in black ink, reading "John H. Chun". The signature is fluid and cursive, with the first name "John" being larger and more prominent than the last name "Chun".

John H. Chun

United States District Judge